

EXHIBIT 2

Declaration of

Patrick Swiber

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*Counsel for Defendants
Robert Bosch GmbH and
Robert Bosch LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re: Volkswagen ‘Clean Diesel’ Marketing, Sales Practices, and Products Liability Litigation

This document relates to:

Iconic Motors, Inc., et al. v. Volkswagen Group of America, Inc., et al., No. 3:17-cv-3185-CRB

LEAD CASE No. 15-md-02672-CRB

**DECLARATION OF PATRICK SWIBER
IN SUPPORT OF BOSCH
DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL**

Hon. Charles R. Breyer

1 I, Patrick Swiber, do hereby declare as follows:

2 1. I am an attorney at Cleary Gottlieb Steen & Hamilton LLP, counsel for Robert
3 Bosch GmbH and Robert Bosch LLC (the “Bosch Defendants”).

4 2. Pursuant to Civil Local Rule 79-5(e)(1), I submit this declaration in support of the
5 Bosch Defendants’ Administrative Motion to Seal (the “Motion”). The Bosch Defendants request
6 that portions of Group Exhibit E (the “Exhibit”) to Plaintiffs Iconic Motors, Inc. d/b/a Elgin
7 Volkswagen and Slevin Capital Investments, Inc.’s Opposition to Robert Bosch GmbH and
8 Robert Bosch LLC’s Motion for Summary Judgment, ECF No. 8256-13, remain under seal. I
9 have personal knowledge of the facts stated herein and could and would testify competently to the
10 matters stated.

11 3. The Exhibit contains personally identifying information – including the names,
12 contact information, and job titles – of current or former employees of the Bosch Defendants.
13 The Bosch Defendants respectfully request that the Court permit the redaction of personally
14 identifying information of non-party employees of the Bosch Defendants, consistent with this
15 Court’s prior orders to that effect. *See* ECF Nos. 1767, 2059, 4049, 4104, 5223, 6321. For the
16 reasons explained in the Court’s prior orders, good cause exists for sealing the personal
17 information of non-parties. *See, e.g.*, ECF No. 1767 at 3-4 (granting the Bosch Defendants’
18 motion to redact “names, job titles, and other identifying information” of non-party employees
19 because “the disclosure of the non-party employees’ names would infringe on those individuals’
20 privacy rights” and the sealing of job titles “is [] necessary where the job title can identify the
21 employee.”).

22
23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on February 21, 2025 in New York, New York.

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26 

27 Patrick Swiber
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